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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

L.D., individually and on behalf of K.D., a minor, Plaintiff, vs. UNITED HEALTHCARE INSURANCE COMPANY, UNITED BEHAVIORAL HEALTH, and the INSPERITY GROUP HEALTH PLAN, Defendants.	DECLARATION OF SAMUEL M. HALL Civil No. 1:21-cv-00121 – RJS – DBP Judge Robert J. Shelby Magistrate Judge Dustin B. Pead
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DECLARATION OF SAMUEL M. HALL

1. I am an attorney over the age of 18 years, a member in good standing of the Utah State Bar, am competent to provide this testimony and I have personal knowledge of the matter of which I testify.
2. I received my J.D. in 2016 from the S.J. Quinney School of Law at the University of Utah. I have practiced law continuously in the State of Utah since 2016.

3. I have represented ERISA participants at the district court level in Utah. I have drafted pleadings that have been filed in the district courts of several other states.
4. I am admitted to practice before the state and federal courts in Utah.
5. My current practice consists predominantly of representing ERISA plaintiffs in their denied health, long-term disability, and life insurance claims.
6. Before joining the law firm of Brian S. King, my billable rate for litigation matters was \$255 per hour. My current hourly rate for representation of ERISA plaintiffs on a non-contingent fee basis is \$325 per hour.
7. I keep track of the time for cases on which I work, including contingent fee cases. As indicated in the ledger of time and description of work provided following this page, I worked 27.2 hours on this matter.
8. The total hours for my work in this matter multiplied by the hourly rate I identified in this Declaration are \$8,840.00.
9. I believe the time I put into the case was necessary to obtain the results we realized in the case and was reasonable and appropriate under the circumstances of this case.
10. I certify under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

DATED this 26th day of September, 2023.

/s/ Samuel M. Hall
Samuel M. Hall

Time records for Sam Hall in *J.S. and S.S. v. United Healthcare Ins. Co.*, Civil No. 2:21-cv-483:

<u>01/21/2023</u> : Began drafting motion for summary judgment	2.6
<u>01/23/2023</u> : Continued drafting motion for summary judgment	5.5
<u>01/24/2023</u> : Continued drafting motion for summary judgment	0.2
<u>01/25/2023</u> : Finished drafting motion for summary judgment.	3.8
<u>01/27/2023</u> : Last revisions to motion for summary judgment.	1.2
<u>03/02/2023</u> : Drafted MSJ opposition.	7.6
<u>03/03/2023</u> : Last revisions to MSJ opposition.	0.3
<u>03/20/2023</u> : Research related to legal issue for MSJ reply.	1.4
<u>03/22/2023</u> : Began drafting MSJ reply.	2.1
<u>03/23/2023</u> : Finished drafting MSJ reply.	1.2
<u>03/24/2023</u> : Last revisions to MSJ reply.	0.4
<u>07/18/2023</u> : Prepared outline of arguments for MSJ hearing.	0.9

Total Hours Billed: 27.2

Total Cost @ \$325/Hour Billing Rate: \$8,840.00